

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

George L and Robin C Kix
Debtor(s)

William C. Miller Standing Chapter 13 Trustee,
Creditor

In Re:
George L and Robin C Kix

Case No.: 17-14162-MDC

Judge: MDC

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

☐ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☒ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor.
A hearing has been scheduled for _____, at _____.

OR

- ☒ Motion to Dismiss filed by the Standing Chapter 13 Trustee.
A hearing has been scheduled for March 4, 2021, at 9:30 AM.

- ☐ Certification of Default filed by creditor,
I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee
I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons **(choose one):**

☐ Payments have been made in the amount of \$____, but have not been accounted for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows **(explain your answer)**: _____

☒ Other **(explain your answer)**: Debtors will make post-petition arrears in full. Receipts will be supplied at hearing.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 02/19/2021

/s/George L Kix

Debtor's Signature

Date: 02/19/2021

/s/Robin C Kix

Debtor's Signature